

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

KAIFI LLC,

Plaintiff,

v.

T-MOBILE US, INC., ET AL.

Defendants.

Case No. 2:20-cv-00281-JRG

JURY TRIAL DEMANDED

Honorable Rodney Gilstrap

JOINT MOTION TO EXTEND STAY

Plaintiff KAIFI LLC (“KAIFI”) and Defendants T-Mobile US, Inc. and T-Mobile USA, Inc. (“T-Mobile”) respectfully request an extension of the stay granted by the Court on December 2, 2021.

On December 1, 2021, the parties believed that they had reached a settlement in principle. The parties jointly notified the Court that same day and moved to stay these proceedings in order to finalize the settlement. Dkt. 446. On December 2, 2021, the Court granted the stay. Dkt. 447.

Subsequently, the parties negotiated over a long-form agreement to finalize the settlement. The parties have not been able to reach agreement. KAIFI believes that the parties are irreconcilably at odds over fundamental conditions of a final settlement. However, the parties have agreed to make a final effort to reach an agreement by mediating with Judge Folsom. Therefore, the parties respectfully request a brief extension of the stay for ten days for this purpose.

Respectfully submitted,

Date: January 3, 2022

/s/ Robert Christopher Bunt

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), the undersigned met and conferred with opposing counsel and this motion is being filed as a joint motion.

/s/ Robert Christopher Bunt
ROBERT CHRISTOPHER BUNT

CERTIFICATE OF SERVICE

Pursuant to Local Rule CV-5(a), the undersigned hereby certifies that the foregoing document was filed and served electronically on January 3, 2021 to all counsel of record.

/s/ Robert Christopher Bunt
ROBERT CHRISTOPHER BUNT